



DAVIDOFF HUTCHER & CITRON LLP

ATTORNEYS AT LAW

605 THIRD AVENUE
NEW YORK, NEW YORK 10158

TEL: (212) 557-7200

FAX: (212) 286-1884

WWW.DHCLLEGAL.COM

MEMO ENDORSED

FIRM OFFICES

WHITE PLAINS
ATTORNEYS AT LAW
120 BLOOMINGDALE ROAD
WHITE PLAINS, NY 10605
(914) 381-7400

PALM BEACH
ATTORNEYS AT LAW
250 ROYAL PALM WAY
SUITE 202
PALM BEACH, FL 33480
(561) 567-8488

FIRM OFFICES

ALBANY
ATTORNEYS AT LAW
150 STATE STREET
ALBANY, NY 12207
(518) 465-8230

WASHINGTON, D.C.
ATTORNEYS AT LAW
201 MASSACHUSETTS AVENUE N.E.
WASHINGTON, D.C. 20002
(202) 347-1117

July 3, 2023

By ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: Bamonte, as Administrator, et al., v. Charatan, as Executor, No. 7:22-cv-795-KMK

Dear Judge Karas:

We are incoming counsel to Defendant in the captioned matter, and have concurrently filed a Stipulation and Order of Substitution of Counsel, which is awaiting this Court's endorsement.

We write pursuant to Your Honor's Individual Rules of Practice I(C), to respectfully request a 45-day stay of proceedings in this matter. This request is made to afford us the opportunity to review the case files and the docket, and to otherwise familiarize ourselves with this complex matter. We note that there are significant upcoming deadlines, including a deadline to produce responses (including documents) to discovery demands on July 5, 2023. Having just been retained today, we have not even received the voluminous case files from outgoing counsel, let alone review them. As such, there is no conceivable way that we will be in a position to comply with upcoming deadlines, while concurrently getting up to speed on 17 months of litigation.

We thank the Court for its consideration.

Denied. This case has been put on a strict schedule for good reason. That Defendant elected to change counsel does not provide a license to alter the schedule.

Respectfully submitted,

Larry Hutcher
Larry Hutcher

So Ordered:  7/5/23

cc: All Counsel of Record (via ECF)